DOCKET SECTION

BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF RESPONSES TO NASHUA, DISTRICT, MYSTIC & SEATTLE INTERROGATORIES (NDMS/USPS-ST43-2e(ii)-(g)(iii), 3a(ii)-(vi), and 16) (November 21, 1997)

The United States Postal Service hereby moves for late acceptance of responses filed yesterday to the following interrogatories of Nashua, District, Mystic & Seattle, dated November 5, 1997: NDMS/USPS-ST43-2e(ii)-(g)(iii), 3a(ii)-(vi), and 16. These responses were due to have been filed on November 12, 1997.

In addition to the reasons cited in the October 14, 1997, motion for late acceptance of witness Daniel's responses to NDMS interrogatories, the responses filed yesterday were late because the determination to redirect them could not be made until witness Daniel returned from out-of-town on November 10, 1997, and identified potential sources of responsive information to which the questions should be redirected. As soon as possible, the questions were redirected; preparation and review of responses was given high priority, but those tasks could not be completed until today.

Accordingly, these responses are late by a total of eight days. The Postal Service considers this tardiness unfortunate, but unavoidable under the circumstances. To mitigate any prejudice caused by this delay, facsimile copies of the responses were transmitted to counsel for NDMS yesterday.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 21, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 November 21, 1997